

REMARKS

In the above-mentioned office action, all of the pending claims, claims 1-10 were rejected. Claims 1, 3-4, and 6-9 were rejected under Section 103(a) over the combination of Longoni and Hall. And, claims 2, 5, and 10 were rejected under Section 103(a) over the combination of Longoni, Hall, and well-known prior art.

The Examiner relied upon Longoni for showing receiving of a reconfiguration command and for detecting a trigger event that indicates that a cell update is required.

While the Examiner acknowledged that Longoni does not disclose a reconfiguration command that includes an activation time nor of delaying an initiation time of a cell update until a reconfiguration has been applied, the Examiner relies upon Hall for showing a reconfiguration command including a reconfiguration command including an activation time at which a reconfiguration is to be applied and for delaying initiation of a cell update until the reconfiguration has been applied.

The Examiner further asserted that these references further disclose user equipment configured to communicate with a UTRAN in a UMTS communication system and of suppressing a cell update depending upon the relevance of a trigger event to the UTRAN after reconfiguration.

The Examiner's reliance upon Hall for showing the features acknowledged by the Examiner not to be disclosed in Longoni is believed to be in error. Specifically, the Examiner relies upon column 4, lines 6-20, column 9, lines 40-51, and column 11, line 48-column 12, line 20 as the basis for the assertion that Hall discloses a reconfiguration command including an activation time and delaying initiation of a cell update. The cited portions of Hall refer to a "cell update flag" that is set when a cell is updated (see, e.g. column 4, line 15). The flag is used to determine whether a second paging message should be sent to the mobile station (see, e.g., Figure 8, box 107, and column 12, lines 6-17).

The cited portions, as well as others, fail to disclose a reconfiguration command including an activation time in which a reconfiguration is to be applied, all as recited in claim 1. As set forth in claim 1, upon detection of a trigger event, which indicates that a cell update is required, initiation of the cell update is delayed until a reconfiguration is applied.

In contrast, Hall discloses, at column 5, line 66-column 6, line 4, "...for each cell examining whether the cell has been updated since the last contact between the packet data node and the mobile station, and sending a second paging message to all cells having been updated since the last contact between the packet data node and the mobile station...". Thus, in contrast to the recitations of claim 1, Hall does not disclose controlling of when a cell update is performed.

As Hall fails to disclose this operation, and Longoni is acknowledged by the Examiner not to disclose such an operation, no combination of these two references can be combined to form the invention recited in claim 1.

Claims 3, 6, and 8 are analogously analyzed, and for the same reasons, these claims are believed to be distinguishable over the cited combination of references.

As dependent claims 2, 4-5, 7, and 9-10 include all of the limitations of their respective parent claims, these claims are believed to be patentably distinguishable over the cited combination of references for the same reasons as those given with respect to their parent claims.

In light of the foregoing, reexamination and reconsideration for allowance of independent claims 1, 3, 6, and 8, and the dependent claims dependent thereon, is respectfully requested. Such early action is earnestly solicited.

Respectfully submitted,

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